1 AIMEE CLARK NEWBERRY, ESQ. Nevada Bar No. 11084 2 **CLARK NEWBERRY LAW FIRM** 410 S. Rampart Blvd., Suite #390 3 Las Vegas, Nevada 89145 T: (702) 608-4232 4 F: (702) 946-1380 5 aclarknewberry@cnlawlv.com Attorney for LVRR #63 6 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 LAS VEGAS RENTAL AND REPAIR LLC CASE NO.: 2:22-cv-00413-JCM-EJY 10 SERIES 63, a Nevada limited liability company, 11 Plaintiff, STIPULATION AND ORDER TO 12 EXTEND TIME TO ANSWER VS. 13 OR OTHERWISE PLEAD NATIONSTAR MORTGAGE, LLC d/b/a 14 MR. COOPER; QUALITY LOAN SERVICE CORPORATION, DOE 15 individuals I through XX; and ROE CORPORATIONS I through XX, 16 17 Defendants. 18 Plaintiff Las Vegas Rental and Repair LLC Series 63 (LVRR #63) and Defendant Nationstar 19 Mortgage LLC d/b/a Mr. Cooper (Nationstar), by their attorneys, hereby submit this Stipulation for 20 an extension of time for Nationstar to answer or otherwise plead up to and including May 8, 2022. In 21 support of this Stipulation, the parties state as follows: 22 1. On March 9, 2022, this Court granted an extension until March 23, 2022 for Nationstar 23 to file its response to Plaintiff's complaint. [Doc. #5] 24 2. Nationstar's previous attorney is no longer with the firm of Troutman Pepper Hamilton 25 Sanders LLP, and a new attorney will be handling this case. 26 3. Nationstar desires additional time for its new attorney to review the Complaint, 27 investigate its allegations, and prepare an appropriate response to LVRR #63's Complaint.

Nationstar now seeks an order before this Court extending Nationstar's time to answer

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or otherwise plead, up to and including May 8, 2022, and for LVRR #63 to file its Motion for Preliminary Injunction by May 8, 2022.

- 5. The parties also stipulate that the foreclosure sale of the subject property located at 7205 Amber Cascade Court, Las Vegas, NV 89149, currently scheduled for April 6, 2022, will be postponed until the Motion for Preliminary Injunction can be heard in the normal course.
- 6. This is the second request for additional time sought by the parties in this action. This extension is sought in good faith and not for the purposes of delay. Neither party will be prejudiced by this extension.

DATED this 22 <sup>nd</sup> day of March 2022	DATED this 22 <sup>nd</sup> day of March 2022
CLARK NEWBERRY LAW FIRM	TROUTMAN PEPPER HAMILTON SANDERS LLP
/s/ Aimee Clark Newberry AIMEE CLARK NEWBERRY, Esq. Nevada Bar No. 11084 410 S. Rampart Blvd., Suite 390 Las Vegas, NV 89145 Attorney for Collegium #10	/s/ Brody R. Wight BRODY R. WIGHT, ESQ. Nevada Bar No. 13615 8985 S. Eastern Ave., Ste. 200, Las Vegas, NV 89123 (Nevada Office) 600 Peachtree St. NE #3000, Atlanta, GA 30308 (Corporate Office) Attorney for Nationstar Mortgage LLC, dba Mr. Cooper

IT IS HEREBY ORDERED that Plaintiff LVRR #63 shall file its Motion for Preliminary Injunction on or before May 8, 2022.

IT IS FURTHER HEREBY ORDERED that Defendant Nationstar shall file its responsive pleading to the Complaint on or before May 8, 2022.

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IT IS FURTHER HEREBY ORDERED that the foreclosure sale of the subject property located at 7205 Amber Cascade Court, Las Vegas, NV 89149, currently scheduled for April 6, 2022, will be postponed until the Motion for Preliminary Injunction can be heard in the normal course. Dated: March 22, 2022 Respectfully submitted by: CLARK NEWBERRY LAW FIRM /s/ Aimee Clark Newberry AIMEE CLARK NEWBERRY, ESQ. Nevada Bar No. 11084 410 S. Rampart Blvd., #390 Las Vegas, NV 89145 (702) 608-4232 Attorney for LVRR #63